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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALTERNATIVE PETROLEUM  
TECHNOLOGIES HOLDINGS,  
CORP. and ALTERNATIVE  
PETROLEUM TECHNOLOGIES,  
INC.,

Plaintiffs,

vs.

PATRICK GRIMES,

Defendant.

Case Number

3:20-cv-00040-MMD-CLB

Defendant's Motion for Attorney Fees

**DEFENDANT'S MOTION FOR ATTORNEY'S FEES**

Pursuant to at least Fed. R. Civ. P. 54(d)(2) and LR 54-14, Defendant Patrick Grimes hereby moves for attorney's fees against Plaintiffs and their counsel, jointly and severally. In support thereof, Defendant Patrick Grimes states as follows:

**SUMMARY**

Pursuant to Fed. R. Civ. P. 54(d)(2) and LR 54-14, Defendant hereby requests that the court order Plaintiffs and their counsel, jointly and severally, to pay Defendant's reasonable attorney fees, at a reasonable hourly rate of \$320/hour for Attorney Bretzius<sup>1</sup>, for 167.0 hours of attorney time, and at a reasonable hourly rate of \$450/hour for Attorney Hebert<sup>2</sup>, for 24.1 hours of attorney time. Additionally, Defendant seeks \$3,230.90 in nontaxable costs. Thus, Defendant requests that the Court order Plaintiffs and their counsel to pay, jointly and severally, \$67,515.90 to Defendant.

The Defendant is entitled to attorney fees pursuant to at least 35 U.S.C. § 285; 28 U.S.C. § 1927; and the court's inherent power. The Defendant requests an hourly rate of \$320/hour and \$450/hour, which is at or below the market rate for services of lawyers with comparable skill and experience in this district. The amount of time reported herein for each of the services provided is reasonable given the work product required by Plaintiffs' actions and the work product filed with the Court. Accordingly, the attorney's fees sought are authorized by law, reasonable, and should be awarded to Defendant.

**DETAILS OF FEE REQUEST**

**I. HOURLY RATE**

Defendant requests attorney fees at a reasonable hourly rate of \$320/hour for Attorney Bretzius and \$450/hour for Attorney Hebert.

Generally, when determining a reasonable hourly rate, the relevant community is the forum in which the district court sits. Barjon v. Dalton, 132 F.3d 496, 500 (9th Cir.

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<sup>1</sup> Attorney Bretzius has been practicing law for almost eight (8) years.

<sup>2</sup> Attorney Hebert has been practicing law for forty (40) years.

1 1997). Reasonable hourly rates are “those prevailing in the community for similar services  
 2 by lawyers of reasonably comparable skill, experience, and reputation.” Id. (citing Blum v.  
 3 Stenson, 465 U.S. 886, 895 n.11 (1984)).

4 In 2021, this District has repeatedly found reasonable hourly rates to be at least  
 5 \$350/hour for attorneys with experience similar to Attorney Bretzius and approximately  
 6 \$500/hour for attorneys with experience similar to Attorney Hebert. See, e.g., Wunderlich  
 7 v. State Farm Mutual Automobile Ins. Co., Case No. 2:21-cv-00486 (D. Nev. Dec. 28,  
 8 2021) (awarding \$375/hour for nine-year practitioners and \$550/hour for well-known  
 9 practitioner who has practiced law for over 30 years); Moreland v. Goldy LLC, Case No.  
 10 2:19-cv-01971-KJD-NJK (June 22, 2021) (approving \$350/hour); Gunn v. Grage, Case  
 11 No. 2:19-cv-2102-JCM-EJY (Mar. 5, 2021) (finding \$525-\$675/hour reasonable for  
 12 attorneys and \$265/hour reasonable for paralegal); Perrong v. Sperian Energy Corp., Case  
 13 No. 2:19-cv-00115-RFB-EJY (Jan. 4, 2021); (approving \$450-\$500/hour for attorneys and  
 14 \$275/hour for law clerk).

15 The requested hourly rates of \$320/hour and \$450/hour exceed the rate typically  
 16 found reasonable for law clerks and paralegals but are lower than the prevailing rate for  
 17 attorneys with similar experience, *supra*. Accordingly, the Court should find the  
 18 Defendant’s requested hourly rates to be reasonable and appropriate.

## 19 **II. ITEMIZATION OF WORK PERFORMED**

20 Defendant requests attorneys’ fees for 191.1 total hours of attorney time, as  
 21 specifically set forth in itemization attached hereto as Exhibit A, with 24.1 hours performed  
 22 by Attorney Hebert and 167.0 hours performed by Attorney Bretzius.

1           **III.    TOTAL AMOUNT OF ATTORNEY FEES TO BE AWARDED**

2           The lodestar method is the customary method the court uses when determining  
 3 attorneys' fees. Morales v. City of San Rafael, 96 F.3d 359, 363 (9th Cir. 1996). "The  
 4 'lodestar' is calculated by multiplying the number of hours the prevailing party reasonably  
 5 expended on the litigation by a reasonable hourly rate." Id.; see also McGrath v. City of  
 6 Nevada, 67 F.3d 248, 252 (9th Cir. 1995).

7           Based on the above, the lodestar in this matter is calculated by multiplying 167.0  
 8 hours by the reasonable hourly rate of \$320/hour, and 24.1 hours by the reasonable hourly  
 9 rate of \$450/hour, to equal a total lodestar amount of \$64,285:

10	Attorney Bretzius	167.0 hours X \$320/hour = \$53,440
11	Attorney Hebert	24.1 hours X \$450/hour = \$10,845
12		Total Lodestar Amount = \$64,285

13           The lodestar amount is a presumptively reasonable fee. Camacho v. Bridgeport  
 14 Fin., Inc., 523 F.3d 973, 982 (9th Cir. 2008). Although presumptively reasonable, the court  
 15 may adjust the lodestar amount based on the *Kerr* factors to account for facts that have not  
 16 been subsumed in the lodestar calculation. Id. As required by LR 54-14(a)(3), the  
 17 Defendant has attached hereto as Exhibit B a brief summary of the *Kerr* factors for the  
 18 Court's further review, as necessary. See Kerr v. Screen Extras Guild, Inc., 526 F.2d 67,  
 19 70 (9th Cir. 1975).

20           **IV.    ITEMIZATION OF NONTAXABLE COSTS**

21           Pursuant to LR 54-14(a)(2), Defendant requests \$3,230.90 in nontaxable costs, as  
 22 specifically set forth in the itemization and supporting documentation attached hereto as  
 23 Exhibit C.

1           **V.     ATTORNEY AFFIDAVITS**

2           Pursuant to L.R. 54-14(b), Defendant has provided herewith the required Attorney  
3 Affidavits as Exhibits D and E.

4  
5                           **MEMORANDUM OF POINTS AND AUTHORITIES**

6           **I.     ATTORNEY FEES, GENERALLY**

7           "Generally, litigants in the United States pay their own attorneys' fees, regardless  
8 of the outcome of the proceedings." Staton v. Boeing Co., 327 F.3d 938, 965 (9th Cir.  
9 2003). "In order to encourage private enforcement of the law, however, Congress has  
10 legislated that in certain cases prevailing parties may recover their attorneys' fees from the  
11 opposing side. Id. An award of attorneys' fees serves the important purpose of "deter[ring]  
12 the bringing of lawsuits without foundation." CRST Van Expedited, Inc. v. EEOC  
13 ("CRST"), 578 U.S. 948, 962 (2016). (quotation omitted).

14           Here, Defendant is entitled to attorney fees pursuant to 38 U.S.C. § 285; 28 U.S.C.  
15 § 1927; and the Court's inherent power.

16           **II.     38 U.S.C. § 285.**

17           **A. Standard**

18           **38 U.S.C. § 285 provides, in its entirety, that:**

19                       "The court in exceptional cases may award reasonable  
20 attorney fees to the prevailing party."

21           In Octane Fitness, LLC v. ICON Health & Fitness, Inc. ("Octane"), 572 U.S. 545,  
22 554 (2014), the Supreme Court held that "an "exceptional" case is simply one that stands  
23 out from others with respect to the substantive strength of a party's litigating position

(considering both the governing law and the facts of the case) or the unreasonable manner in which the case was litigated.” “District courts may determine whether a case is "exceptional" in the case-by-case exercise of their discretion, considering the totality of the circumstances”. Octane, 572 U.S. at 554. In assessing the totality of the circumstances, the Court may consider, inter alia, "frivolousness, motivation, objective unreasonableness (both in the factual and legal components of the case) and the need in particular circumstances to advance considerations of compensation and deterrence." Id. at n.6. The Supreme Court has urged that “equitable discretion should be exercised `in light of the considerations we have identified.” Id. at 554. “Section 285 demands a simple discretionary inquiry; it imposes no specific evidentiary burden, much less such a high one.” Id. Defendant must prove its Section 285 motion by a preponderance of the evidence. Id.

#### **B. Defendant is the Prevailing Party.**

In order to be a “prevailing party” under 35 U.S.C. § 285, "a defendant need not obtain a favorable judgment on the merits in order to be a `prevailing party.'" CRST, 578 U.S. at 962-63. "The defendant may prevail even if the court's final judgment rejects the plaintiff's claim for a nonmerits reason." Id. at 963. This is logical, explained the U.S. Supreme Court, because "[t]he defendant has ... fulfilled its primary objective whenever the plaintiff's challenge is rebuffed, irrespective of the precise reason for the court's decision," even if the defendant "might prefer a judgment vindicating its position regarding the substantive merits of the plaintiff's allegations." Id. As Wright & Miller explains with respect to awarding costs to the prevailing party, "dismissal of the action, whether on the merits or not, generally means [the] defendant is the prevailing party," 10 Wright, Miller

1 & Kane, Federal Practice and Procedure § 2667 (3d ed. 2002); see also Raniere v. Microsoft  
2 Corp., 887 F.3d 1298 (Fed. Cir. 2018) (defendant who obtained dismissal for lack of  
3 standing found to be the prevailing party).

4 Here, Defendant's Motion for Summary Judgment was granted because Plaintiffs  
5 lacked standing. ECF No. 50. As a result, the Court dismissed the case in its entirety. Id.  
6 Judgment was entered in favor of Defendant. ECF No. 51. As a result, Defendant is the  
7 prevailing party.

8 **C. This matter is an Exceptional Case.**

9 The Court must determine whether this was an "exceptional case," considering the  
10 totality of the circumstances under a preponderance of the evidence standard.

11 For the Court's guidance, similar cases have been found "exceptional" where the  
12 facts fall into at least one or more of the following categories: (1) the plaintiff failed to  
13 conduct pre-filing investigation; (2) the plaintiff's motivation for filing suit was to be a  
14 nuisance; (3) the case was resolved on minimal required evidence or fact finding; (4) the  
15 plaintiff was on notice of a frivolous litigation position and did nothing to correct it; and  
16 (5) the plaintiff hid and/or failed to disclose material evidence. This case has all of these  
17 factors.

18 **i. Pre-Filing Investigation**

19 Cases where a pre-filing investigation would have avoided litigation have been  
20 found to be exceptional. See, e.g., ThermoLife International LLC v. GNC Corp., 922 F.3d  
21 1347, 1355 (Fed. Cir. 2019) (pre-suit investigation would have revealed frivolous lawsuit);  
22 Adjustacam, LLC v. Newegg, Inc., 861 F.3d 1353, 1361 (Fed. Cir. 2017) (pre-suit  
23 investigation would have revealed that accused product did not rotate as required for

infringement); Lumen View Technology LLC v. Findthebest. com, Inc., 811 F. 3d 479 (Fed. Cir. 2016) (pre-suit investigation would have revealed that accused product did not have required feature for patent infringement).

## **ii. Nuisance**

Prior cases have been found exceptional where they were filed only to serve as a nuisance to defendant. See, e.g., Lumen View Technology LLC, 811 F. 3d 479 (motivation for filing suit was to be a nuisance to defendant to extract a settlement); Eon-Net LP v. Flagstar Bancorp., 653 F.3d 1314, 1327 (C.A. Fed. 2011) (patent holder "acted in bad faith by exploiting the high cost to defend [patent] litigation to extract a nuisance value settlement").

## **iii. Minimal Evidence or Fact-Finding**

Cases have been found exceptional when they are resolved with little or no necessary factual investigation. See, e.g., Pop Top Corp. v. Rakuten Kobo Inc., Case No. 20-cv-04482-DMR (N.D. Cal Jan. 28, 2022) (plaintiff's taking of zero depositions and little discovery demonstrates case is exceptional); Giesecke & Devrient GmbH v. United States, 146 Fed. Cl. 631 (Fed. Cl. 2020) ("Unlike many Section 285 requests, this case is in the early stages of litigation... [and] did not take much development of a record ...mak[ing] this case 'stand out' from others");

## **iv. Notice and Failure to Cure**

When a plaintiff continues to litigate with explicit actual notice of the defect in its case, such as a lack of standing, the case is found exceptional. See, e.g., Raniere v. Microsoft Corp., 887 F.3d 1298 (Fed. Cir. 2018) (plaintiff promised to produce evidence to cure standing defect and repeatedly failed to produce said evidence); Adjustacam, LLC,



861 F.3d at 1361 (plaintiff litigated in unreasonable manner when it knowingly failed to provide expert report with notice to do so); Nat'l Oilwell Varco, L.P. v. Omron Oilfield & Marine, Inc., 676 Fed.Appx. 967, 973 (Fed. Cir. 2017) (plaintiff was on notice about its potential lack of standing when defendant from another case challenged the lack of a written assignment); Intex Recreation Corp. v. Team Worldwide Corp., 77 F. Supp. 3d 212 (D.D.C. 2015) (court's claim construction order foreclosed further infringement argument and made continuance of the action exceptionally meritless).

**v. Failure to Disclose**

Prior cases have been held exceptional where a plaintiff hides or fails to disclose evidence to the defendant and the Court. See, e.g., Iris Connex, LLC v. Dell, Inc., 235 F. Supp. 3d 826, 862 (E.D. Tex 2017) (individual hid real party in interest and plaintiff's standing by executing an assignment without authority).

**vi. The present case is exceptional based on its substantive strength and the manner in which the case was litigated, consistent with similar precedent.**

This case is exceptional for all of the reasons described in the above precedent, as well as additional circumstances that have not been, and may never be, seen in any case.

First and foremost, it is self-evident that plaintiff conducted no pre-filing investigation. In fact, Plaintiffs allegedly sent a demand letter on January 16, 2020 to inform Defendant of Plaintiff's "allegations" regarding three of the five patents, and Plaintiff filed suit five (5) calendar days later on January 21, 2020. See ECF No. 1 at p 98/99. Even if it wasn't self-evident, Plaintiffs admitted at deposition that they conducted no prefiling investigation:

1                   Q:     Did plaintiffs do anything to investigate the claims made by  
2                             Mr. Waldron that there was improper inventorship?

3                   A:     Not that I'm aware of. We believe what Jack said.  
4                             ECF No. 36-8, 42:25-43:4.

5                   If the Plaintiffs had actually conducted any pre-suit investigation, they would have  
6                   discovered many flaws of their case, including that they did not own the subject patents.  
7                   Such investigation would have saved the Court and Defendant two years' worth of time  
8                   and resources. But, the Plaintiffs did not seek to conduct any pre-filing investigation because  
9                   their sole purpose in filing suit against Defendant was to serve as a nuisance. Specifically,  
10                  in Nevada state court, Defendant has initiated a lawsuit against the Plaintiffs. In retaliation,  
11                  the Plaintiffs alleged that they owned patents so that they could sue Defendant to drain his  
12                  resources and stay/delay his state lawsuit. This is the type of conduct that is found to make  
13                  a case exceptional.

14                 Additionally indicative of the exceptionality of this case is the fact that this entire  
15                 action was resolved solely based on a three-page document. See ECF No. 36-20. It is even  
16                 worse that said document was not timely produced by Plaintiffs in their initial disclosures  
17                 and was not produced by Plaintiffs after many interrogatory and production requests.  
18                 Instead, Plaintiffs responded to Defendant's discovery requests, including those asking for  
19                 Plaintiffs' alleged "chain of title to and ownership of the patents-in-suit" by objecting that  
20                 such requests were "Burdensome", "Duplicative", and "Compound". See ECF No. 36-23,  
21                 Interrogatory #2. Plaintiffs even alleged that Plaintiffs produced "relevant, non-privileged  
22                 documents, to the extent that such documents exist" when no written assignment had been  
23                 provided! See Id. On February 12, 2021, approximately one week prior to the close of  
                  Discovery and after repeated letters and correspondence from Defendant's counsel,

1 Plaintiffs finally supplemented their responses and produced the fatal three-page  
2 assignment document, buried in almost 2000 pages of duplicative production and  
3 intentionally mislabeled as “Highly Confidential – Attorney’s Eyes Only”. Yet again,  
4 Plaintiffs’ actions required further action from Defendant’s counsel, including yet another  
5 letter to contest the improper classification, to which Plaintiffs never even responded. (As  
6 the Court is aware, assignment documents are typically made part of the public record, but  
7 Plaintiffs here have attempted to rely on numerous ownership documents that were not of  
8 record and were seemingly created during this litigation.) These types of activities are  
9 characteristic of an exceptional case.

10 If the above was not bad enough, Plaintiffs were on notice from the Defendant and  
11 the Court that their suit was fatally flawed. See ECF No. 21, p. 4, lines 18-19 (“It then  
12 became the obligation of APT to produce evidence of standing – an ownership interest in  
13 the patents”); ECF No. 31, p. 5, lines 27-28 (“If Plaintiffs were not the assignee and  
14 exclusive licensee of the patents, they might not have standing.”). Plaintiffs did nothing to  
15 cure the noticed standing defect, except seemingly fabricate the fatal three-page assignment  
16 document during this litigation. Plaintiffs’ failures to correct after notice are sufficient to  
17 make this case exceptional. Raniere v. Microsoft Corp., 887 F.3d 1298 (Fed. Cir. 2018)  
18 (case held exceptional where plaintiff failed to produce evidence of standing). However,  
19 the case became even more exceptional, as, after Plaintiffs admitted that their chain of title  
20 was invalid, they continued to litigate frivolously, including requiring Defendant to file a  
21 Reply (ECF No. 44) and respond to a frivolous Motion to Strike (ECF No. 43) that required  
22 more time and cost expenditures from Defendant that were not needed.

23

1 Even more, correction of inventorship is very typically resolved by a motion in a  
2 related patent infringement suit. However, because Plaintiffs have not identified any  
3 alleged infringer and sought solely to expose Defendant to expenditures of time and money,  
4 they commenced and maintained this two-year lawsuit for correction of something that is  
5 typically resolved by motion. This, too, evidences the exceptionality of this case.

6 Finally, unbeknownst to the Court or the Defendant at the time, contemporaneous  
7 to the Court's December 2020 order, Plaintiffs actively sought to destroy evidence while  
8 discovery was still open in this matter. Specifically, in late 2020, Plaintiffs intentionally  
9 refused to pay rental fees for their storage unit, so that the contents would be sold or  
10 destroyed, and not accessed by Defendant. Plaintiffs failed to maintain a litigation hold.  
11 Defendant propounded timely discovery requests in January 2021 and Plaintiffs did not  
12 even have custody of the storage unit. Tellingly, Plaintiffs did not even inform Defendant  
13 that they had lost custody of the storage unit. With discovery of Plaintiffs' misconduct,  
14 Defendant was obligated to stop destruction of the contents (See ECF No. 46) and pay to  
15 retain the contents pending the disposition of this matter. These costs should be included  
16 as part of the fees and nontaxable costs that Plaintiffs should be ordered to pay, caused by  
17 Plaintiffs' violation of the mandatory litigation hold. Defendant is not aware of any other  
18 instance where a plaintiff has willfully sought to destroy evidence while maintaining its  
19 own action, which clearly makes this case one of the most exceptional cases under patent  
20 law.

21 In light of all of the above circumstances, Plaintiff clearly litigated in an  
22 unreasonable manner and this case is exceptional. Defendant is entitled to attorneys fees  
23 pursuant to 35 U.S.C. § 285.

1     **III.     28 U.S.C. § 1927 & Court's Inherent Power**

2             Additionally or alternatively, Defendant is entitled to attorney fees pursuant to 28  
3     U.S.C. § 1927 and the Court's inherent power.

4             **A. Standard**

5             28 U.S.C. § 1927 provides that:

6                     "Any attorney. . . who so multiplies the proceedings in any case  
7                     unreasonably and vexatiously may be required by the court to satisfy  
8                     personally the excess costs, expenses, and attorneys' fees reasonably  
                    incurred because of such conduct."

9             An award of fees under 28 U.S.C. § 1927 requires a finding of subjective bad faith,  
10     which "is present when an attorney knowingly or recklessly raises a frivolous argument, or  
11     argues a meritorious claim for the purpose of harassing an opponent." W. Coast Theater  
12     Corp. v. City of Portland, 897 F.2d 1519, 1528 (9th Cir. 1990); see also Barber v. Miller,  
13     146 F.3d 707, 711 (9th Cir. 1998).

14             In addition to the points discussed above that are applicable to this discussion, this  
15     case parallels very closely to many cases that have awarded attorney fees under 28 U.S.C.  
16     § 1927 and the Court's inherent power.

17             First, statutory standing is such a basic foundational principle that courts expect  
18     plaintiffs' attorneys to know if their clients do or do not have standing. Proceeding with an  
19     obvious lack of standing, like the Plaintiffs did here, warrants attorney fees. See Liberty  
20     Legal Found. v. Nat'l Democratic Party of the USA, Inc., No. 12-2143-STA, at \*4 (W.D.  
21     Tenn. Aug. 24, 2012) (finding case frivolous and without any basis in law where "counsel  
22     for Plaintiff[s] reasonably should have known that all Plaintiffs lacked standing to bring  
23     this suit" because named entity was not associated).

1           Second, the present Plaintiffs only sought to recover attorney fees in this action  
2           (ECF No. 16-1) and ultimately “concede[d] their chain of title was invalid” when proven  
3           so by Defendant. ECF No. 50 at p. 3, line 8-9. This is likewise grounds for attorney fees.  
4           See Advocates for Individuals with Disabilities, LLC v. MidFirst Bank, No. CV-16-01969-  
5           PHX-NVW (D. Ariz. July 24, 2018) (awarding defendant fees where plaintiff sued solely  
6           to recover plaintiff’s attorney fees and where plaintiff conceded that they lacked standing  
7           when challenged).

8           Third, Plaintiffs’ counsel continued to file and multiply the proceedings after  
9           conceding that his clients did not have standing, including requiring Defendant to prepare  
10          a Reply (ECF No. 44) regarding the Motion for Summary Judgment, requiring Defendant  
11          to respond to a Motion to Strike (ECF No. 43); and requiring Defendant to take action to  
12          preserve evidence that Plaintiffs were responsible for maintaining (ECF No. 46). None of  
13          these proceedings should have been necessary. Almost the entirety of the proceedings  
14          occurred after Plaintiffs were already on notice from the Defendant and Court that they  
15          needed and did not have ownership of the patents. See ECF No. 21, p. 4, lines 18-19 (“It  
16          then became the obligation of APT to produce evidence of standing – an ownership interest  
17          in the patents”); see also ECF No. 31, p. 5, lines 27-28 (“If Plaintiffs were not the assignee  
18          and exclusive licensee of the patents, they might not have standing.”). The bulk of the  
19          proceedings could have been entirely avoided if Plaintiffs and Plaintiffs’ counsel timely  
20          conceded their noticed fatal flaw in ownership. Plaintiffs required these additional filings  
21          to add delay and expense to Defendant’s state action against Plaintiffs. These types of  
22          conduct are clearly those that 28 U.S.C. § 1927 was designed to deter.

1 Fourth, Plaintiffs' counsel played discovery games to require Defendant's counsel  
2 to spend time and effort responding to frivolous discovery issues. By way of brief example,  
3 Plaintiffs' counsel (1) failed to provide foundational ownership responses and documents  
4 in response to discovery requests; (2) intentionally mislabeled said documents as "Highly  
5 Confidential" amongst duplicative documents when finally provided; and (3) prohibited  
6 Defendant from observing deposition testimony relevant to patent ownership. The fact that  
7 all of this information normally is and should have been part of the public assignment  
8 record available at the USPTO only further illuminates the frivolousness of these actions.

9 Finally, Plaintiffs' intentional, reckless, and bad faith attempts to destroy their  
10 documents resulted in additional proceedings and expense that would not have been  
11 otherwise necessary (E.g. ECF No. 46 and related expenses). "A duty to preserve  
12 information arises when a party knows or should know that the information is relevant to  
13 pending or future litigation." Pettit v. Smith, 45 F. Supp. 3d 1099, 1105 (D. Ariz. 2014).  
14 "Once a party knows that litigation is reasonably anticipated, the party owes a duty to the  
15 judicial system to ensure preservation of relevant evidence." Surowiec v. Capital Title  
16 Agency, Inc., 790 F. Supp. 2d 997, 1006 (D. Ariz. 2011). "The duty to preserve is triggered  
17 not only when litigation actually commences, but also extends to the period before  
18 litigation when a party should reasonably know that evidence may be relevant to  
19 anticipated litigation." Pettit, 45 F. Supp. 3d at 1105 (quotation omitted). The duty includes  
20 instituting a "litigation hold" on any document retention/destruction policies in effect. In  
21 re Napster, Inc. Copyright Litig., 462 F. Supp. 2d 1060, 1070 (N.D. Cal. 2006); Surowiec,  
22 790 F. Supp. 2d at 1006 (defense counsel is obligated to start a "litigation hold" when they  
23 receive correspondence threatening litigation). Defendant is not aware of a matter where

1 Plaintiff has failed to institute and maintain a litigation hold during its own proceeding,  
2 evidencing the true bad faith that Plaintiffs and their counsel have orchestrated in this  
3 action.

4 In sum, Defendant should be awarded attorney fees under 28 U.S.C. § 1927.  
5 Alternatively or additionally, the court should award fees under the court's inherent power  
6 for the above referenced willful bad faith and reckless actions designed solely to expose  
7 Defendant to additional expense and to delay Defendant's state law action. See, e.g., Fink  
8 v. Gomez, 239 F.3d 989, 993-94 (9th Cir. 2001) (attorney's reckless misstatements of law  
9 and fact, combined with an improper purpose, are sanctionable under the court's inherent  
10 power).

### 11 CONCLUSION

12 Through this entire action, Plaintiffs provided no evidence of ownership requisite  
13 for statutory standing. When Plaintiffs attempted to introduce evidence of ownership, it  
14 was clearly flawed and presented for the sole purpose of delaying Defendant's state action  
15 against them. As a result, the Defendant is entitled to attorney fees pursuant to at least 35  
16 U.S.C. § 285 and 28 U.S.C. § 1927. The Defendant has requested a reasonable hourly rate  
17 and has shown that the amount of time requested and costs were reasonable under the stated  
18 circumstances. Accordingly, the Court should order Plaintiffs and their counsel, jointly and  
19 severally, to pay the total amount of \$67,515.90 to Defendant.

20 Dated this 8th day of February, 2022.

/s/ Daniel S. Bretzius

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Attorneys for Defendant  
Patrick Grimes

**CERTIFICATE OF SERVICE**

Pursuant to LR 5-1, the undersigned certifies that, on February 8, 2022, I served the attached Motion for Attorney Fees and Exhibits via ECF to counsel of record for Plaintiffs:

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Dated this 8th day of February, 2022

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[dan@danblaw.com](mailto:dan@danblaw.com)

Attorney for Defendant  
Patrick Grimes

**Exhibit A – Itemization of Work Performed**

<b><u>Date</u></b>	<b><u>Description &amp; Attorney</u></b>	<b><u>Hours</u></b>
2/8/2020	Reviewing Complaint; Researching law on correction of inventorship of patents; telephonic correspondence with client (CMH)	2.0
2/12/2020	Preparing and filing Answer (CMH)	1.3
2/12/2020	Preparing and filing Certificate of Interested Parties (CMH)	0.3
2/19/2020	Reviewing Notice of Early Case Conference (CMH)	0.1
2/25/2020	E-mail correspondence to client re obligations under Fed. R. Civ. P. 26(f) (CMH)	0.3
2/26/2020	Telephonic Discovery Planning Conference (CMH)	0.5
3/11/2020	Preparing and serving Defendant's First Requests for Production of Documents (CMH)	2.0
3/31/2020	Reviewing signed, filed Scheduling Order from Court (CMH)	0.2
3/31/2020	Reviewing signed, filed Protective Order (CMH)	0.1
4/7/2020	Preparing and serving Defendant's First Set of Request for Admissions (CMH)	0.7
4/10/2020	Researching standing in patent cases (CMH)	3.0
4/17/2020	Researching federal law on motions for summary judgment; preparing and filing motion for summary judgment due to lack of standing (CMH)	2.5
4/20/2020	Researching damages in inventorship correction cases (CMH)	1.7
5/6/2020	Reviewing order setting Case Management Conference (CMH)	0.1
5/8/2020	Receipt and Review of Plaintiffs' Opposition to Motion for Summary Judgment (CMH)	0.3
5/13/2020	Preparing and filing Joint Case Management Report (CMH)	1.5
5/22/2020	Researching standing; preparing and filing Reply in Support of Motion for Summary Judgment (CMH)	2.0
12/7/2020	Reviewing order re Motion for Summary Judgment (CMH)	0.2
12/14/2020	Preparing and serving Defendant's First Set of Interrogatories (CMH)	0.5

1	1/19/2021	Telephonic correspondence with client (DSB)	0.6
2	1/21/2021	E-mail correspondence with opposing counsel re Plaintiffs' late discovery responses and Grimes deposition (DSB)	0.3
3	1/21/2021	Telephonic correspondence with client (DSB)	0.3
4	1/22/2021	Reviewing file and drafting letter re Plaintiffs' deficient discovery responses (DSB)	2.8
5	1/22/2021	Telephonic correspondence with client (DSB)	0.2
6	1/23/2021	Reviewing file and previous discovery; drafting Second Set of Production Requests; e-mail correspondence with Plaintiffs' counsel re same (DSB)	5.0
7	1/25/2021	Telephonic correspondence with client (DSB)	0.3
8	1/26/2021	E-mail correspondence with Plaintiffs' counsel re Grimes deposition (DSB)	0.1
9	1/27/2021	E-mail correspondence with Plaintiffs' counsel re Grimes deposition (DSB)	0.2
10	1/28/2021	E-mail correspondence with Plaintiffs' counsel re deposition (DSB)	0.1
11	1/28/2021	Preparing for and defending client in deposition (DSB)	8.0
12	1/28/2021	E-mail correspondence with Plaintiffs' counsel re Plaintiffs' deficient discovery responses and upcoming depositions (DSB)	0.5
13	2/1/2021	Telephonic correspondence with client (DSB)	1.2
14	2/2/2021	E-mail correspondence with opposing counsel re January 28, 2021 e-mail correspondence (DSB)	0.1
15	2/4/2021	Attempted telephone correspondence with Plaintiffs' counsel re unanswered e-mail correspondence (DSB)	0.1
16	2/5/2021	Attempted telephone correspondence with Plaintiffs' counsel re unanswered e-mail correspondence (DSB)	0.1
17	2/5/2021	E-mail correspondence with opposing counsel re February 2, 2021 and January 28, 2021 e-mail correspondence (DSB)	0.1
18	2/8/2021	E-mail correspondence with opposing counsel re discovery correspondence dating back to at least January 28, 2021 (DSB)	0.4
19	2/10/2021	E-mail correspondence with opposing counsel re discovery correspondence dating back to at least January 28, 2021 (DSB)	0.5
20			
21			
22			
23			

1	2/10/2021	Telephonic correspondence with client (DSB)	0.4
2	2/11/2021	E-mail correspondence with opposing counsel re deposition notices (DSB)	0.1
3	2/11/2021	Telephonic correspondence with client (DSB)	1.3
4	2/12/2021	E-mail correspondence with opposing counsel re discovery correspondence dating back to at least January 28, 2021 (DSB)	0.4
5	2/13/2021	Telephonic correspondence with client (DSB)	1.3
6	2/14/2021	E-mail correspondence with opposing counsel re 30(b)(6) deposition (DSB)	0.1
7	2/14/2021	E-mail correspondence with stenographer re updated deposition notices (DSB)	0.1
8	2/14/2021	Telephonic correspondence with client (DSB)	1.5
9	2/15/2021	Reviewing file and preparing for 30(b)(6) Deposition (DSB)	5.8
10	2/15/2021	E-mail correspondence with opposing counsel re 30(b)(6) deposition (DSB)	0.1
11	2/16/2021	E-mail correspondence with opposing counsel re 30(b)(6) deposition (DSB)	0.2
12	2/16/2021	Telephonic correspondence with client (DSB)	0.8
13	2/17/2021	E-mail correspondence with opposing counsel re upcoming depositions (DSB)	0.1
14	2/18/2021	E-mail correspondence with opposing counsel re Feb 17, 2021 correspondence (DSB)	0.1
15	2/19/2021	E-mail correspondence with opposing counsel re updated deposition notices (DSB)	0.2
16	2/19/2021	E-mail correspondence with stenographer re updated deposition notices (DSB)	0.1
17	2/20/2021	Preparing for Waldron deposition (DSB)	5.1
18	2/21/2021	Preparing for Waldron deposition (DSB)	3.6
19	2/21/2021	Reviewing 30(b)(6) deposition objection received same day from opposing counsel (DSB)	0.1
20	2/21/2021	Telephonic correspondence with client (DSB)	1.5
21	2/22/2021	E-mail correspondence with opposing counsel re deposition (DSB)	0.1
22	2/22/2021	Attending 30(b)(6) deposition (DSB)	5.6
23			

1	2/22/2021	Telephonic correspondence with client (DSB)	1.5
2	2/23/2021	E-mail correspondence with opposing counsel re deposition (DSB)	0.1
3	2/23/2021	Attending Waldron Deposition (DSB)	1.8
4	2/23/2021	Attending Carter Deposition (DSB)	0.7
5	2/23/2021	Telephonic correspondence with client (DSB)	2.8
6	2/27/2021	Telephonic correspondence with client (DSB)	0.6
7	3/1/2021	Reviewing file and preparing motion for summary judgment (DSB)	3.1
8	3/3/2021	Reviewing file and preparing motion for summary judgment (DSB)	1.6
9	3/6/2021	Reviewing file and preparing motion for summary judgment (DSB)	1.8
10	3/7/2021	Reviewing file and preparing notice re confidentiality (DSB)	2.1
11	3/7/2021	Researching and preparing motion for summary judgment (DSB)	0.9
12	3/8/2021	E-mail correspondence with opposing counsel notice re confidentiality (DSB)	0.2
13	3/8/2021	Telephonic correspondence with client (DSB)	1.4
14	3/10/2021	Reviewing 30(b)(6) deposition and preparing index re same (DSB)	2.6
15	3/11/2021	Reviewing Waldron and Carter personal depositions and creating indices re same (DSB)	1.8
16	3/12/2021	Reviewing all depositions and preparing combined index (DSB)	1.2
17	3/13/2021	Reviewing file, depositions & indexes; researching and preparing MSJ (DSB)	4.2
18	3/14/2021	Reviewing file, depositions & indexes; researching and preparing MSJ (DSB)	3.3
19	3/20/2021	Telephonic correspondence with client (DSB)	2.5
20	3/23/2021	Finalizing and filing MSJ (DSB)	0.4
21	3/23/2021	Telephonic correspondence with client (DSB)	0.6
22	3/24/2021	Reviewing Plaintiffs' first and second MSJ (DSB)	1.1
23			

1	3/24/2021	Telephonic correspondence with client (DSB)	1.2
2	3/25/2021	Telephonic correspondence with client (DSB)	1.6
3	3/27/2021	Telephonic correspondence with client (DSB)	0.9
4	3/29/2021	Telephonic correspondence with client (DSB)	0.7
5	3/31/2021	Telephonic correspondence with client (DSB)	0.3
6	4/5/2021	Telephonic correspondence with client (DSB)	1.1
7	4/6/2021	Reviewing file, researching, and preparing Responses to Plaintiffs' MSJs (DSB)	3.2
8	4/7/2021	Reviewing file, researching, and preparing Responses to Plaintiffs' MSJs (DSB)	2.2
9	4/10/2021	Telephonic correspondence with client (DSB)	1.6
10	4/11/2021	Reviewing file, researching, and preparing Responses to Plaintiffs' MSJs (DSB)	5.1
11	4/12/2021	Reviewing file, researching, and preparing Responses to Plaintiffs' MSJs (DSB)	3.5
12	4/13/2021	Reviewing file, researching and preparing Responses to Plaintiffs' MSJs (DSB)	6.1
13	4/13/2021	Finalizing and Filing Responses to MSJ (DSB)	0.4
14	4/13/2021	Telephonic correspondence with client (DSB)	1.7
15	4/14/2021	Reviewing Plaintiffs' Response to Def's MSJ (DSB)	1.8
16	4/16/2021	Reviewing file, researching, and preparing Reply in Support of MSJ (DSB)	4.1
17	4/18/2021	Reviewing file, researching, and preparing Reply in Support of MSJ (DSB)	3.5
18	4/19/2021	Reviewing file, researching, and preparing Reply in Support of MSJ (DSB)	2.0
19	4/20/2021	Reviewing file, researching, and preparing Reply in Support of MSJ (DSB)	2.1
20	4/25/2021	Reviewing file, researching, and preparing Reply in Support of MSJ (DSB)	2.4
21	4/27/2021	Finalizing and Filing Responses to MSJ (DSB)	2.6
22	4/27/2021	Reviewing Plaintiffs' Motion to Strike (DSB)	1.4
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1	4/27/2021	Reviewing file, researching, and preparing Response to Plaintiffs' Motion to Strike (DSB)	3.8
2	4/27/2021	Telephonic correspondence with client (DSB)	2.0
3	4/28/2021	Reviewing file, researching, and preparing Response to Plaintiffs' Motion to Strike (DSB)	2.6
4	4/29/2021	Telephonic correspondence with client (DSB)	0.8
5	4/30/2021	Reviewing file, researching, and preparing Response to Plaintiffs' Motion to Strike (DSB)	3.1
6	5/2/2021	Reviewing file, researching, and preparing Response to Plaintiffs' Motion to Strike (DSB)	3.8
7	5/4/2021	Travel to Public Storage; in-person correspondence with Public Storage employees re Plaintiffs' Storage Unit (CMH)	2.3
8	5/5/2021	Reviewing local rules regarding emergency motions; researching preservation subpoena (CMH)	0.7
9	5/6/2021	Preparing Declaration; Written correspondence with Public Storage representatives re preservation (CMH)	1.8
10	5/6/2021	Researching, preparing, and filing Emergency Motion to Preserve Plaintiffs' evidence (DSB)	3.5
11	5/10/2021	Finalizing and Filing Response to Plaintiffs' Motion to Strike (DSB)	0.3
12	5/17/2021	Reviewing Plaintiffs' Reply re Motion to Strike (DSB)	0.3
13	1/25/2022	Reviewing Order re MSJ and legal research re same (DSB)	1.4
14	1/25/2022	Telephonic correspondence with client (DSB)	0.7
15	1/26/2022	Preparing Bill of Costs (DSB)	0.8
16	1/26/2022	Researching and Preparing Motion for Attorney Fees (DSB)	2.1
17	1/27/2022	Researching and Preparing Motion for Attorney Fees (DSB)	1.6
18	2/2/2022	Researching and Preparing Motion for Attorney Fees (DSB)	2.1
19	2/7/2022	Researching and Preparing Motion for Attorney Fees (DSB)	2.8

***Exhibit B – Kerr Factors***

(a) Results Obtained and Amount Involved.

Defendant's attorneys successfully achieved full dismissal of Plaintiffs' action and now seek a total fee award of \$67,515.90

(b) Time and Labor Required.

The main issues related to Defendant's inventorship of five patents and related legal concepts, which are infrequently litigated in appellate courts. Addressing these issues required very directed legal research and independent factual investigation, particularly because Plaintiff was unwilling to provide relevant discovery responses and documentation. Defendant took three depositions and propounded two sets of discovery requests in an attempt to get Plaintiffs to actually produce relevant documentation. Defendant's counsel prevailed on a Motion for Summary Judgment and successfully defended against two of Plaintiffs' Motions for Summary Judgment, along with a frivolous Motion to Strike. Defendant's counsel also was required to seek preservation of evidence that was marked for destruction because Plaintiffs actively failed to retain said evidence.

(c) Novelty and Difficulty of the questions involved.

Defendant's counsel is not aware of a single case where a patent owner alleged improper inventorship of its own patents and commenced suit to change inventorship of the same. This unique factual situation raised interesting concepts, including those raised in Defendant's Motion for Summary Judgment and related Reply.

(d) Skill requisite to perform the legal service properly.

Patent law in general, and actions under 35 U.S.C. § 256 more specifically, are unique areas of law. Given that the case involved unique circumstances, it required counsel



1 to have skill in this area of litigation.

2 (e) Preclusion of other employment by the attorney due to acceptance of the case.

3 Given the amount of time that Defendant's counsel needed to devote to this matter,  
4 they were precluded from taking on other work and projects.

5 (f) Customary Fee.

6 As set forth in the body of Defendant's Motion, the rates of \$320/hour for Attorney  
7 Bretzius and \$450/hour for Attorney Hebert are at or below the reasonable rate for attorneys  
8 with similar experience in Nevada.

9 (g) Fixed Or Contingent Nature of Fee.

10 The fee arrangement in this case was a standard fixed agreement based upon the  
11 hourly rates for time worked.

12 (h) Time limitations imposed by the client or the circumstances.

13 There were no demanding time limitations in this case.

14 (i) The experience, reputation, and ability of the attorney(s).

15 Defendant's counsel are well respected and regarded in their respective areas of  
16 practice. Attorney Hebert has successfully practiced law for forty (40) years. Attorney  
17 Bretzius has practiced law for nearly eight years and graduated *cum laude* from UNH  
18 School of Law in 2014 as both a Daniel Webster Scholar and IP Scholar.

19 (j) The "undesirability" of the case, if any.

20 The Plaintiff's bad faith litigation tactics and withholding of basic evidence  
21 required patience on the part of Defendant's counsel that may have made the case  
22 undesirable for other prospective counsel.

1           (k) The nature and length of the professional relationship with the client.

2           The professional relationship between Defendant and counsel only involved the  
3 years of litigation of this case.

4           (l) Awards in similar cases.

5           There is no case like the present one, but typical awards under 35 U.S.C. § 285  
6 exceed \$100,000 and can rise to millions of dollars.

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*Exhibit C - Nontaxable Costs Included in Fee Award*

<b>Description</b>	<b>Cost</b>
01/08/2021 - Pro Hac Vice Fee	\$250.00
05/17/2021 – Fee to Remove Plaintiffs’ Storage Unit from Destruction	\$899.90
05/17/2021 – Monthly Rental Fees	\$130.50
08/22/2021 – Monthly Rental Fees	\$414.00
09/08/2021 – Monthly Rental Fees	\$228.50
10/05/2021 – Monthly Rental Fees	\$228.00
11/05/2021 – Monthly Rental Fees	\$270.00
12/06/2021 – Monthly Rental Fees	\$270.00
01/03/2022 – Monthly Rental Fees	\$270.00
02/08/2022 – Monthly Rental Fees	\$270.00
<b>TOTAL</b>	<b>\$3,230.90</b>

Defendant has attached supporting documentation hereto.





**PROOF OF  
PUBLICATION**

**STATE OF WISCONSIN SS.  
COUNTY OF BROWN**

PUBLIC STORAGE MGMT/N MCCARRAN  
1020 N MCCARRAN BLVD

RENO NV 89512

Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the date: 03/06/2021 - 03/16/2021, for exact publication dates please see last line of Proof of Publication below.

03/09/2021, 03/16/2021

*M Steinhardt*  
Legal Clerk

Subscribed and sworn before me this  
16th of March 2021.

*Kathleen Allen*  
NOTARY PUBLIC RESIDING  
AT STATE OF WISCONSIN  
COUNTY OF BROWN

Notary Expires:

*1-7-25*

KATHLEEN ALLEN  
Notary Public  
State of Wisconsin

Ad#:0004632997

P O : Public Storage

# of Affidavits 1

This is not an invoice

**NOTICE OF PUBLIC SALE**

To satisfy the owner's storage lien, PS Orange Co. Inc. will sell at public lien sale on March 25, 2021, the personal property in the below-listed units, which may include but are not limited to: household and personal items, office and other equipment. The public sale of these items will begin at 10:00 AM and continue until all units are sold. The lien sale is to be held at the online auction website, [www.storagetreasures.com](http://www.storagetreasures.com), where indicated. For online lien sales, bids will be accepted until 2 hours after the time of the sale specified.

**PUBLIC STORAGE # 23073, 9450 S Virginia St, Reno, NV 89511, (775) 440-6468**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

103 - Tolliver, Tasia; A34 - Delanaza, Rodney; B74 - Delanaza, Rodney; C35 - Saldana-Marquez, Aldo

**PUBLIC STORAGE # 20282, 4875 S McCarran Blvd, Reno, NV 89502, (775) 376-9153**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

1026 - Dzgyrnyluk, Sarah; 2009 - Sanchez, Daniel; 3019 - Renfrow, Shannon; 3020 - Dickey, Dakota; 6015 - Snipe, Alron; 6078 - Gil, Nicholas; 7064 - Galindo, Mario

**PUBLIC STORAGE # 24535, 200 Telegraph Street, Reno, NV 89502, (775) 376-9081**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

A104 - Askin, Andrew; A136-A - Thurman, Keara; A141-A - Bennett, Isreal; A143-F - Orto, Mark; A161 - Alternative Petroleum Technologies Inc. Waldron, Jack; B032-J - Pahe, Brenton Mathew; B037-F - Green, Jacob; C222 - Myers, Melissa; C229 - Caldwell, Thomas; C239 - Huckabee, Dillon; D346 - Aguirre-Marquez, Adriana; E420 - Velasco, Angel; F505 - Iobste, Jeremy

**PUBLIC STORAGE # 77587, 2410 Wrendel Way, Reno, NV 89502, (775) 689-0483**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

1313 - Pursley, Jesse; 1319 - Rivera Herrera, Rodolfo; 1427 - Brooks-Tracy, Tiffany; 1502 - Moghaddam, Darius; 1542 - Jones, Ethan; 1545 - Rea, Freddy; 1603 - Dowd, Keith; 2108 - Moose, Ashley; 2208 - Sanchez, Yvette; 2330 - Jamison, Alicia; 2339 - Segon, Erin; 2343 - Campbell, Dannie; 2452 - Reid, Christopher; 3401 - Reyes, Osbaldo

**PUBLIC STORAGE # 23074, 1295 Selmi Drive, Reno, NV 89512, (775) 432-4048**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

A02 - Jones JR, Randall; A23 - Mcconnell, Alfred; B05 - East, Shannon; B39 - Ream, Desiree; C33 - Smith, Shawn; E14 - Hartman, Kurt; E58 - Davis, James; F21 - Lambert, Karon; H64 - Smith, Savannah

**PUBLIC STORAGE # 23068, 1020 N McCarran Blvd, Reno, NV 89512, (775) 432-6507**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

A025 - Cloud, Connie; A077 - Reid, William; C010 - Green, Heather; C049 - Olivares Gutierrez, OWNER, Gustavo; C059 - Bradley, Joanna; D035 - Riley, Kenneth; F021 - Kern, Lois; G017 - Berlanga, Trina; G027 - Swank, William; G062 - McCarthy, Roman; H003 - Mullins, Nathan; H036 - Sell, Shad; H042 - Cloud, Connie; H052 - Sosa, Lino; I003 - Salkeld, Tony; I004 - Rubicon Explorer Corp Caldwell, Turner

**PUBLIC STORAGE # 23071, 450 Boxington Way, Sparks, NV 89434, (775) 835-4426**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

A036 - Mullins, Bonita; B010 - Jones, Jeanie; C042 - Thetford, Beverly; E032 - Riley, Kelsey; G015 - Acosta, Lizeth; I002 - Starr, Robert; I006 - Lambdin, Bernice; I012 - Berry, Bill; K031 - Tedesco, Gina; K049 - Acosta, Lizeth

**PUBLIC STORAGE # 23067, 1220 Venture Dr, Gardnerville, NV 89410, (775) 238-4463**

Sale to be held at [www.storagetreasures.com](http://www.storagetreasures.com).

B045 - Cleaves, Nicole; C237 - Cleaves, Nicole; D264 - Drugge, David

Public sale terms, rules, and regulations will be made available prior to the sale. All sales are subject to cancellation. We reserve the right to refuse any bid. Payment must be in cash or credit card-no checks. Buyers must secure the units with their own personal locks. To claim tax-exempt status, original RESALE certificates for each space purchased is required. By PS Orangeco, Inc., 701 Western Avenue, Glendale, CA 91201. (818) 244-8080.

0004632997

Mar. 9, 16, 2021





# Your Payment Receipt

200 Telegraph Street, Reno, NV, 89502, (775) 376-9081

 Receipt #: 923187563  
 05/11/2021 3:50:24 PM

Thank you for using Public Storage! This confirms your payment of **\$899.90** on 05/11/2021 by **American Express** ending in **6009**.

## Your Account Details

Jack Waldron

Account Number

Phone

Email

Address

22481805

(775) 409-3951

info@altpetrol.com

280 Greg Street, Suite 20  
Reno, NV 89502

## Storage Payment Details

Location Address: 200 Telegraph Street, Reno, NV, 89502, (775) 376-9081

Space Number: A161

	Payment Received	Past Due/Due Now	Due Next
Rent	\$702.00	\$0.00	\$0.00
Insurance	\$0.00	\$0.00	\$0.00
Late Fees	\$140.40	\$0.00	\$0.00
Lien Fee	\$57.50	\$0.00	\$0.00
Total	\$899.90	\$0.00	\$0.00

## Payment Method Details

	Amount
American Express [REDACTED]	\$899.90
Total	\$899.90

PLEASE SIGN HERE

05/11/2021

DATE

The information contained in this message is confidential and intended only for the recipient to which it was given. ©2017 Public Storage. All rights reserved.



# Your Account

Patrick Grimes | Account Number: 54654127

## Payment History

[Print](#)

[Summary view](#) | [Detailed view](#)

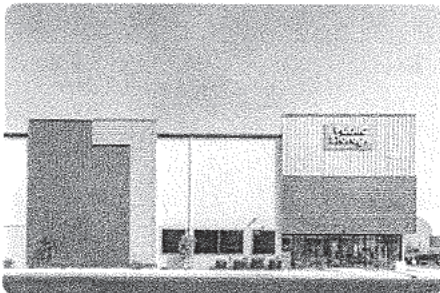
Date	Unit	Payment	Amount
<b>Transaction</b> #212854668  <b>Date Received</b> 02/08/2022	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC  <b>Transaction Type</b> Pending Payment	<b>Amount</b> \$270.00
<b>Transaction</b> #210199847  <b>Date Received</b> 01/03/2022	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC  <b>Transaction Type</b> Payment	<b>Amount</b> \$270.00
<b>Transaction</b> #208302189  <b>Date Received</b> 12/06/2021	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC  <b>Transaction Type</b> Payment	<b>Amount</b> \$270.00
<b>Transaction</b> #206110003  <b>Date Received</b> 11/05/2021	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC  <b>Transaction Type</b> Payment	<b>Amount</b> \$270.00
<b>Transaction</b> #203932027  <b>Date Received</b> 10/05/2021	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC  <b>Transaction Type</b> Payment	<b>Amount</b> \$228.00
<b>Transaction</b> #201999003  <b>Date Received</b> 09/08/2021	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC  <b>Transaction Type</b> Payment	<b>Amount</b> \$228.50

[Ask us](#)



Date	Unit	Payment	Amount
<b>Transaction</b> #200265912	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC [REDACTED]	<b>Amount</b> \$414.00
<b>Date Received</b> 08/22/2021		<b>Transaction Type</b> Payment	
<b>Transaction</b> #941834774	<b>Unit Details</b> 200 Telegraph Street #A161 · 12' x 20'	<b>Payment Method</b> CC [REDACTED]	<b>Amount</b> \$130.50
<b>Date Received</b> 05/17/2021		<b>Transaction Type</b> Payment	

## Public Storage Near Reno, Nevada



### Self Storage Near

2410 Wrondel Way

Reno, NV 89502



### Self Storage Near

4875 S McCarran Blvd

Reno, NV 89502